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6 Attorneys for Defendant,  
Hugo Patricio Coutelin

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8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

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11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 vs.  
14 HUGO PATRICIO COUTELIN,  
15 Defendant.

2:10-cr-00280-KJD-GWF

**EMERGENCY UNOPPOSED MOTION**  
**TO MODIFY CONDITIONS OF**  
**PRETRIAL RELEASE**

16 Defendant, Hugo Patricio Coutelin, moves this Court for a modification of his  
17 conditions of pretrial release pursuant to 18 U.S.C. §3145. This motion seeks permission for Mr.  
18 Coutelin to travel to Bakersfield, California from March 1, 2012 to March 6, 2012, to attend a  
19 custody hearing. This move is supported by Pretrial Services and is not opposed by the government.

20 Mr. Coutelin was arrested for bank robbery in violation of 18 U.S.C. § 1344(1) and  
21 (2) - Conspiracy to Commit Mail Fraud, Wire Fraud, Bank Fraud and Aiding and Abetting. He was  
22 brought before this Court on July 26, 2010. He was released pursuant to the following conditions:

- 23 1. Pretrial Services supervision,  
24 2. 3rd party custody to Leroy Martinez,  
25 3. Maintain/seek employment,  
26 4. Travel restricted to Clark County, Nevada for court only, New Mexico, and  
27 California for immigration issues,  
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5. Do not possess any firearms; ammunition; or dangerous weapons,
6. Refrain from any use of illegal controlled substances,
7. Do not associate with those who use or possess controlled substances,
8. Defendant placed on home detention to be monitored by GPS. If GPS not available, RF may be used,
9. Maintain residence at 902 State Road 76, Espanola, NM.

Since his release, Mr. Coutelin has been in compliance with the conditions of his pretrial release. In fact, he is not being actively supervised in New Mexico at this time. He has been permitted to travel previously and there have been no problems with such travel.

Mr. Coutelin now seeks permission to modify his conditions of pretrial release to allow him to travel to Bakersfield, California to attend an emergency custody hearing. Mr. Coutelin's ten year-old daughter needs to be removed from an unsafe environment in California where she is living and the court in California is requiring Mr. Coutelin's presence for this emergency hearing tomorrow March 2, 2012. Mr. Coutelin will be staying with his sister Rommy Renteros at 6662 Alexandria Dr. Huntington Beach, CA 92647. Ms. Renteros phone number is 714-476-5657.

The government also does not oppose this modification. Mr. Coutelin, thus, requests that this Court allow him to travel to Bakersfield, California to attend his daughter's custody hearing.

DATED this 1st day of March, 2012.

RENE L. VALLADARES  
Federal Public Defender

/s/ Richard F. Boulware

RICHARD F. BOULWARE  
Assistant Federal Public Defender

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 \* \* \*

4 UNITED STATES OF AMERICA,

2:10-cr-00280-KJD-GWF

5 Plaintiff,

6 vs.

**ORDER TO MODIFY CONDITIONS OF  
PRETRIAL RELEASE**

7 HUGO PATRICIO COUTELIN,

8 Defendant.

9  
10 Defendant, Hugo Patricio Coutelin, having moved this Court for modification of his  
11 conditions of pretrial release pursuant to 18 U.S.C. §3145 and Pretrial Services and the Government  
12 having consented to a modification of the conditions of pretrial release,

13 IT IS HEREBY ORDERED THAT, the Defendant Hugo Patricio Coutelin will be  
14 permitted to move to travel to Bakersfield, California from March 1, 2012 to March 6, 2012 where  
15 he will reside with his sister, Rommy Renteros at 6662 Alexandria Dr. Huntington Beach, CA  
16 92647. Ms. Renteros phone number is 714-476-5657.

17 DATED this 1st day of March, 2012.

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22 UNITED STATES MAGISTRATE JUDGE  
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**CERTIFICATE OF ELECTRONIC SERVICE**

The undersigned hereby certifies that she is an employee of the Law Offices of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on March 1, 2012, she served an electronic copy of the above and foregoing **UNOPPOSED MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE**, by electronic service (ECF) to the person named below:

DANIEL BOGDEN  
United States Attorney

Stephen Spiegelhalter and Fred G. Medick  
United States Department of Justice  
Criminal Division, Fraud Section  
1400 New York Avenue, NW  
Washington, DC 20530  
202-307-1423  
Fax: 202-514-6118  
Email: stephen.spiegelhalter@usdoj.gov

Via Electronic Mail to:

Pretrial Officer, Sandra Bustos (Las Vegas) and

/s/ Claudia Lopez

Claudia Lopez, an Employee of the Law Office of the  
Federal Public Defender